

PRESENTMENT DATE AND TIME: September 10, 2014 at 12:00 noon (Eastern Time)
OBJECTION DATE AND TIME: September 10, 2014 at 11:30 a.m. (Eastern Time)

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Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

**NOTICE OF PRESENTMENT OF ORDER AUTHORIZING GENERAL
MOTORS LLC TO FILE A REPLY TO THE RESPONSE BY
WILMINGTON TRUST COMPANY TO THE GILLISPIE MOTION FOR
LEAVE TO PURSUE CLAIMS AGAINST GENERAL MOTORS LLC,
AND, ALTERNATIVELY, TO FILE A POST-BAR-DATE PROOF OF
CLAIM IN THE MOTORS LIQUIDATION COMPANY BANKRUPTCY**

PLEASE TAKE NOTICE that, for the reasons set forth in Paragraph 1 of the proposed
*Reply By General Motors LLC To Response By Wilmington Trust Company To The Gillispie
Motion For Leave To Pursue Claims Against General Motors LLC, And, Alternatively, To File A
Post-Bar-Date Proof Of Claim In The Motors Liquidation Company Bankruptcy* (a copy of

which is annexed to the proposed order as Exhibit “A”), the proposed *Order Authorizing General Motors LLC To File A Reply To The Response By Wilmington Trust Company To The Gillispie Motion For Leave To Pursue Claims Against General Motors LLC, And, Alternatively, To File A Post-Bar-Date Proof Of Claim In The Motors Liquidation Company Bankruptcy*, a copy of which is annexed hereto, will be presented for signature and entry to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **September 10, 2014 at 12:00 noon (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that objections or proposed counter-orders must be made in writing and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq.); and (ii) Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654 (Attn: Richard C. Godfrey, Esq.), so as to be received no later than **September 10, 2014, at 11:30 a.m. (Eastern Time) (“Objection Deadline”)**.

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed before the Objection Deadline, the Court may schedule a hearing thereon at a date and time to be determined, if it believes such hearing is necessary under the circumstances.

Dated: New York, New York
September 5, 2014

Respectfully submitted,

/s/ Arthur Steinberg
Arthur Steinberg
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-And-

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